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DEPT. OF TRANSPORTATION  
DOCKET  
00 FEB 25 PM 12:00  
February 25, 2000

Mr. Steven R. Kratzke  
Acting Associate Administrator for Safety Performance Standards  
National Highway Traffic Safety Administration  
400 Seventh St., S.W., Rm. 5401  
Washington, D.C. 20590

RE: Docket No. 99-6550, Notice of Proposed Rulemaking  
FMVSS 105 & 121 Heavy Vehicle Antilock Brake System (ABS)  
Performance Requirement

On behalf of Mitsubishi Motors R & D of America Inc.<sup>1</sup> (MRDA), I submit the attached comments in response to the agency's Notice of Proposed Rulemaking concerning 49 CFR Part 571- FMVSS 105 & 121 Heavy Vehicle Antilock Brake System (ABS) Performance Requirement, published in the Federal Register on December 12, 1999

If you have any questions concerning this submission, please contact me at (703) 525-4800, ex. 228, or Mr. Bob Barlow of my staff at (703) 525-4800, ex. 222.

Sincerely

Kenichiro Nagata

Vice President & General Manager

Enclosure

CC: Docket Room (2 copies)

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<sup>1</sup> Mitsubishi Motors R&D of America, Inc. is wholly owned by Mitsubishi Motors America, Inc., which in turn is a wholly owned U.S. subsidiary of Mitsubishi Motors Corporation, a publicly traded Japanese corporation.

Mitsubishi Motors Comments to Notice of Proposed Rulemaking  
FMVSS 105 & 121 Heavy Vehicle Antilock Brake System (ABS)  
Performance Requirement  
(Docket No. 99-6550)

In response to NHTSA's Notice of Proposed Rulemaking on the above mentioned heavy vehicle braking requirements, Mitsubishi Motors wishes to raise the following points.

1. Applicable Requirements

Mitsubishi Motors wishes to point out that in the proposed language of S7 of FMVSS 105, which states; "For vehicles only having to meet the requirements of S5.1.1, S5.1.2 S5.1.3, and S5.1.7 in section S5.1, the applicable test procedures and sequence are S7.1, S7.2, S7.4, S7.5, S7.5, S7.9, S7.10, S7.11, and S7.18", appears to be in error. Mitsubishi Motors believes, the underlined S7.11 should be omitted in this section as S7.11 is referenced in the test procedures of S5.1.4 (refer to Table 1 in FMVSS 105) and S5.1.4 is not included in the above-mentioned sections (S5.1.1, S5.1.2, S5.1.3, S5.1.7).

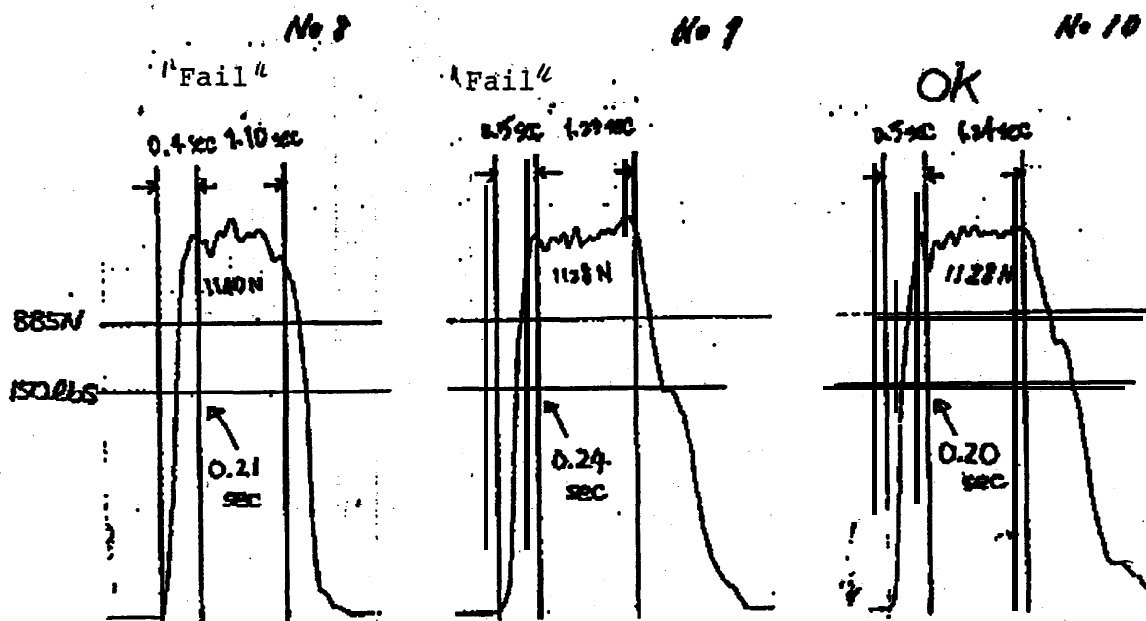
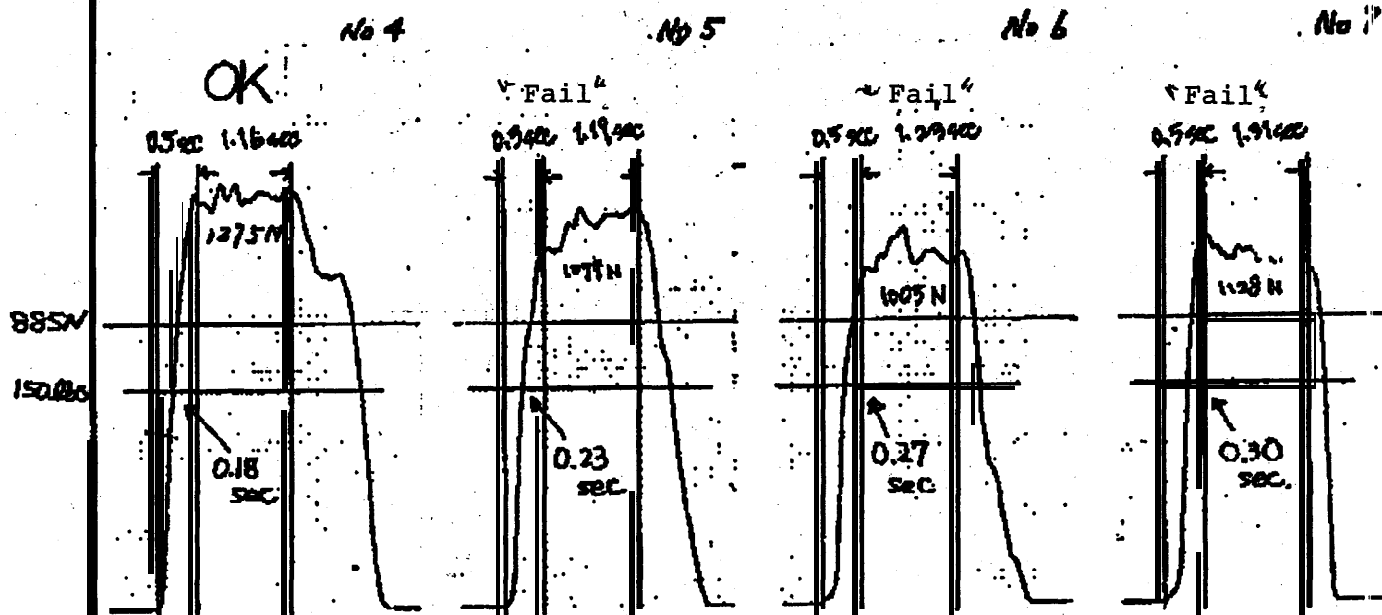
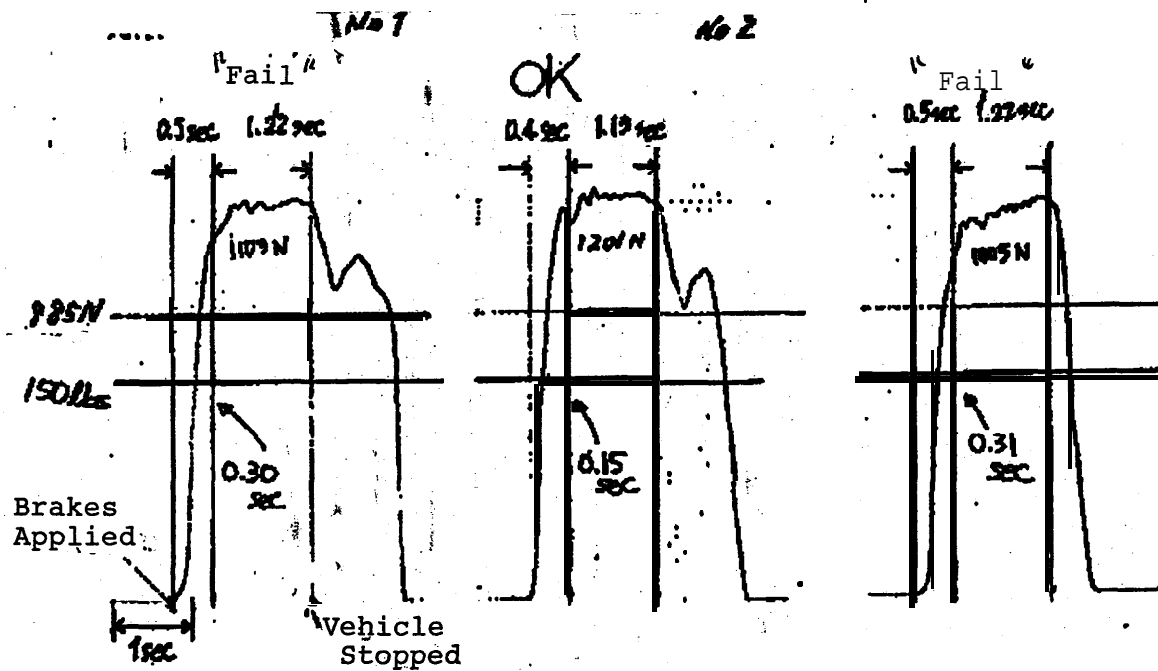
2. Definition of Full Brake Application (S4)

Mitsubishi Motors request that NHTSA amend the definition of "Full Brake Application" in S4 of FMVSS 105, "a brake pedal force of 150 pounds that is to be achieved within 0.2 seconds..", to read; "a brake pedal force of 150 pounds that is to be achieved within **0.5 seconds**".

Mitsubishi makes this request on review of spike stop test data conducted for Australian regulations(ADR 35/0), which is being submitted with this comment (see attachments 1 & 2).

As the data shows, a 150 lb. (68 kg) brake application force at 0.2 seconds was achieved only in three out of ten stops. Given this, Mitsubishi Motors believes that the proposed "... within 0.2 seconds" requirement is impracticable.

Based on the same data, Mitsubishi Motors does believe a 150 lb. (68 kg) brake application force at 0.5 seconds is more practicable value.

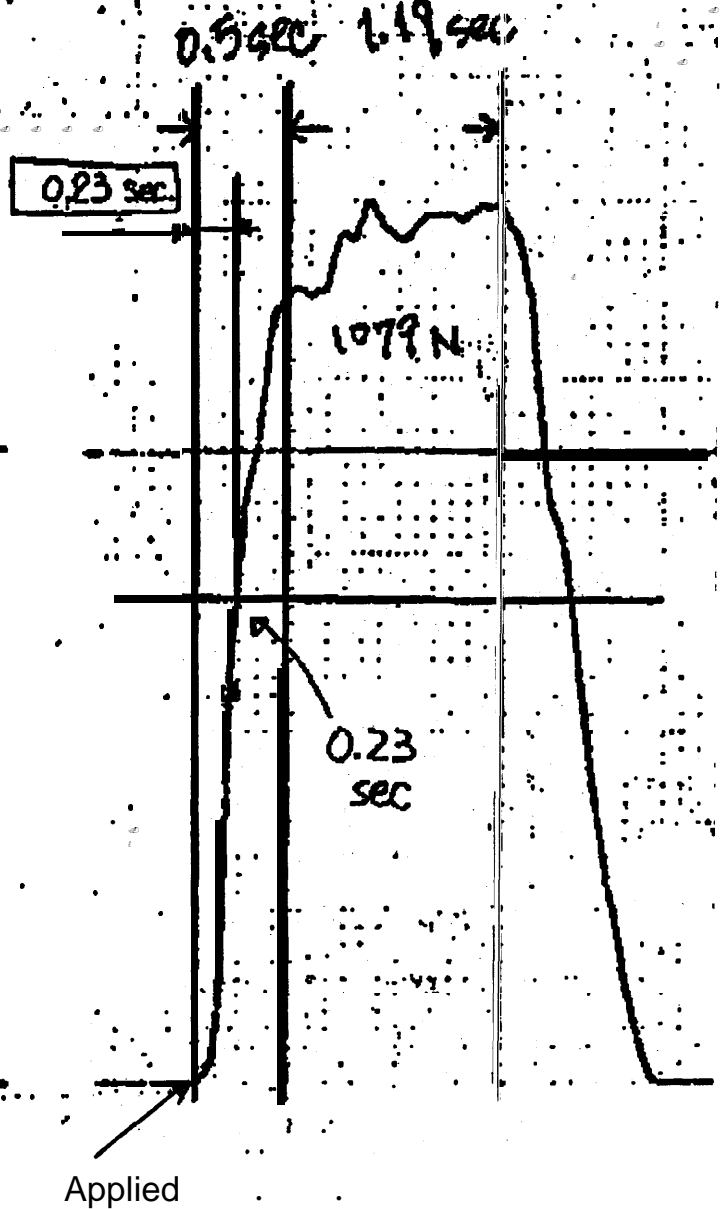
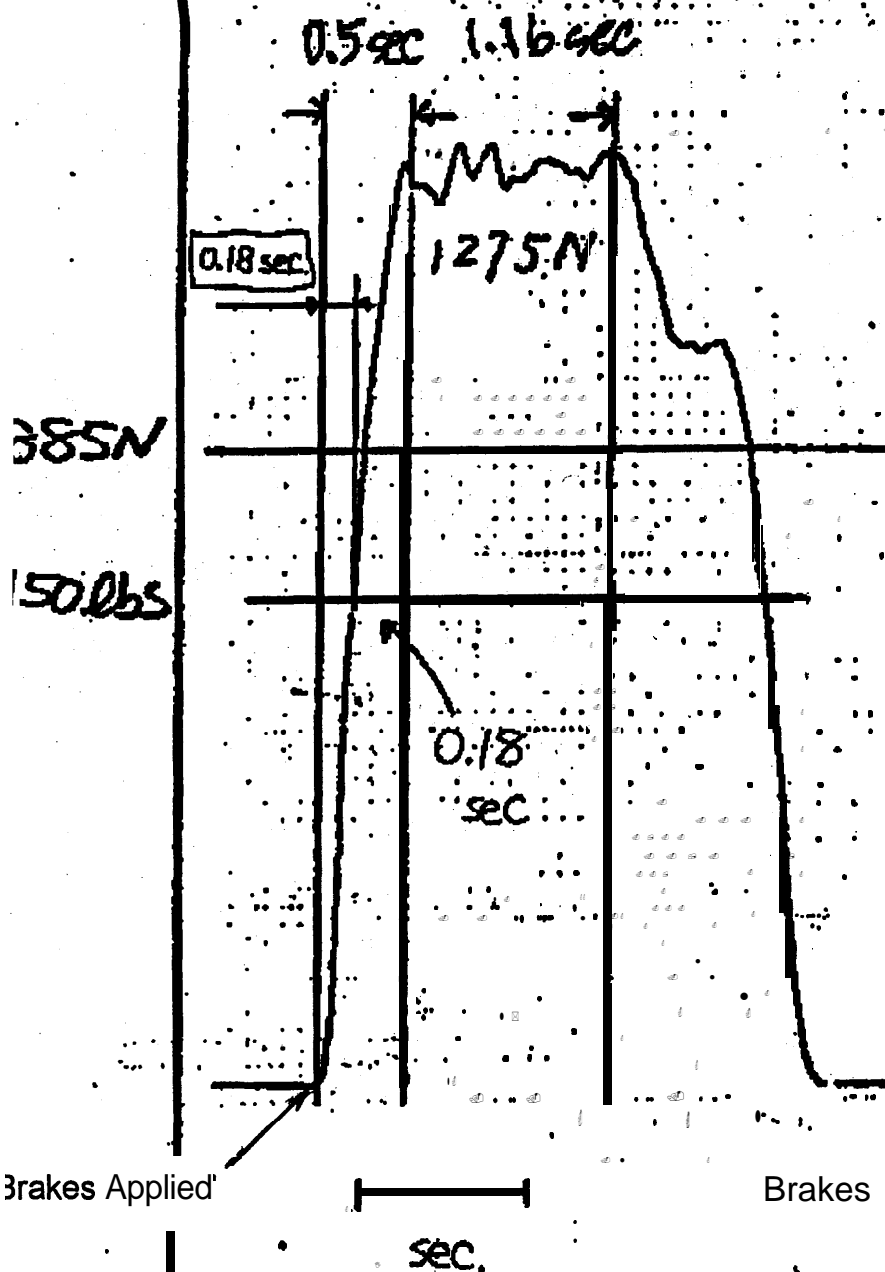


No 4

No 5

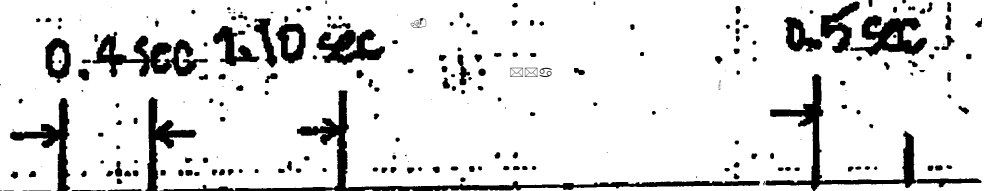
OK

Fail



No 8

Note: For the data presented in attachments 1 & 2, "Fail" only means failure to meet the proposed time requirements for full brake application.



No 4

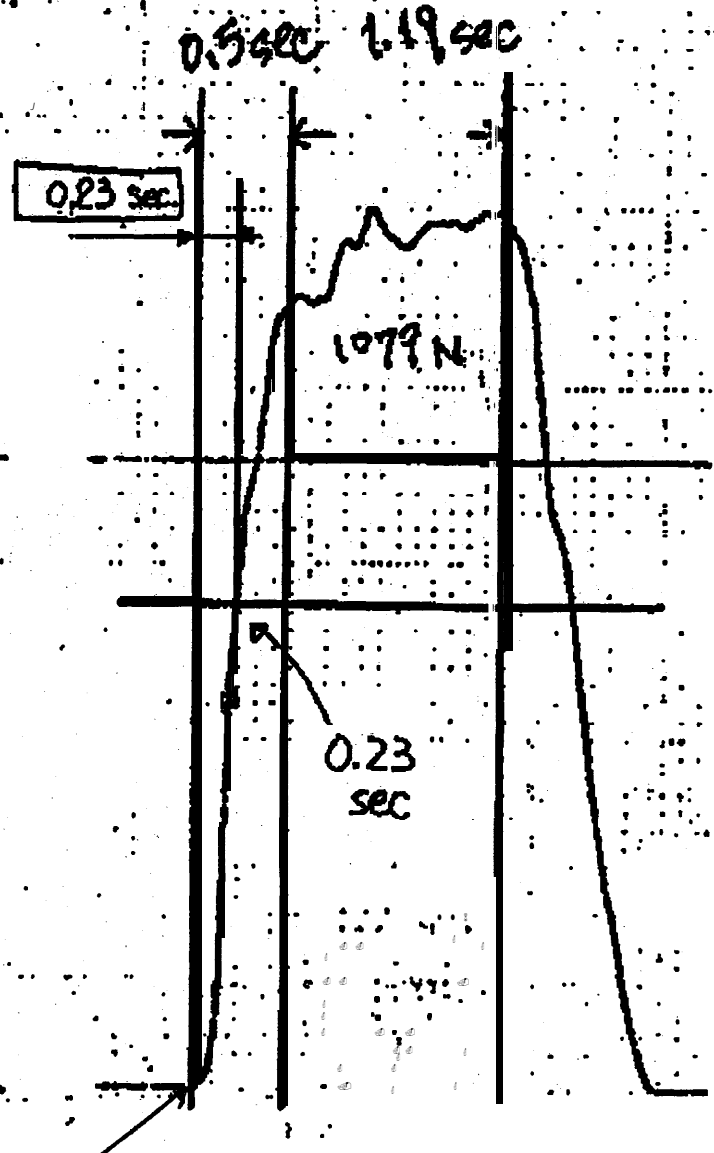
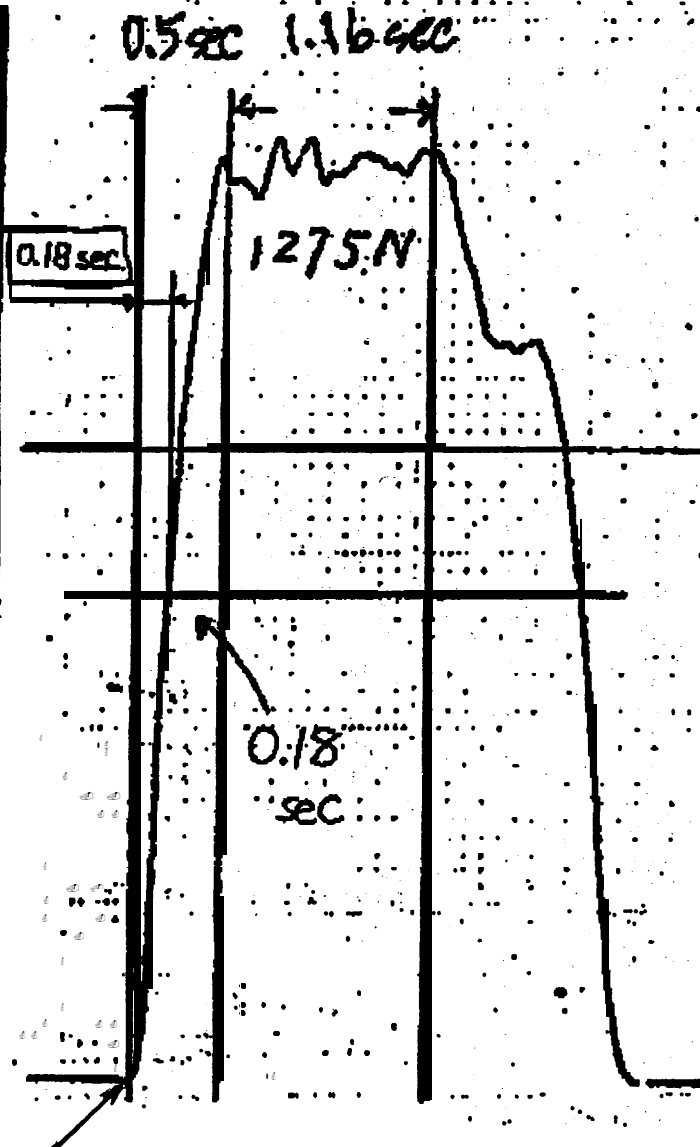
No 5

OK

"Fail"

885N

150lbs



Brakes Applied

Brakes Applied

Note: For the data presented in attachments 1 & 2, "Fail" only means failure to meet the proposed time requirements for full brake application.